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February 10, 2010

BY ECF AND FACSIMILE

Honorable Michael A. Shipp, U.S.M.J.
United States District Court
Martin Luther King Jr.
Federal Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: In re LG Front Load Washing Machine Class Action Litigation
Case No. 08 CV 51 (FSH) (MAS)**

Dear Judge Shipp:

Please accept this letter as the joint case status update regarding scheduling of depositions and inspections that, during the January 29 status conference, Your Honor directed the parties to file by today.

The parties have agreed on a schedule for the remaining depositions and inspections as reflected in the attached Exhibit A, with the exception of Plaintiff Harder's deposition, which Plaintiffs have advised LG USA Electronics, Inc. ("LG USA") needs to be scheduled some time after April 15 and that Plaintiffs will propose dates to LG USA at a later time.

Additionally, for Your Honor's convenience, the parties also attach as Exhibit B a calendar of the depositions and inspections completed to-date so the Court can have the entire discovery schedule in this matter.

Respectfully submitted,

WINSTON & STRAWN LLP
Attorneys for Defendant LG USA

s/ James S. Richter
James S. Richter

WINSTON & STRAWN LLP

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FREED & WEISS LLC

/s/ George K. Lang
George K. Lang
Attorney for Plaintiffs

Encl.

cc: All Counsel of Record (w/encl.)(by e-mail)

Exhibit “A”

Exhibit A: February 2010 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3	4	5	6
7	8	9	10	11	12 Plaintiff Trethewey Inspection (Dowington, PA)	13
14	15 Plaintiff Franko Inspection (Broadview Heights, OH)	16 Plaintiff Harder Inspection (Batavia, OH)	17	18	19	20
21	22 Plaintiff Launch Inspection (Santa Rosa Beach, FL)	23	24 Plaintiffs Jonathan and Carolyn Zimmerman Inspection (Hickory, NC)	25 Plaintiffs Jonathan and Carolyn Zimmerman Depositions (Hickory, NC)	26 Patrick Nutley Rule 30(b)(6) Deposition (Newark, NJ)	27
28						

Exhibit A: March 2010 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3	4	5 Plaintiff Scalise Deposition (Huntley, Illinois)	6
7	8	9	10 Plaintiff Ashe Inspection (Thorofare, NJ)	11 Stacey Casals Rule 30(b)(6) Deposition (Huntsville, AL) Plaintiff Ashe Deposition (Thorofare, NJ)	12	13
14	15	16	17	18 Julie Migala Rule 30(b)(6) Deposition (Huntsville, AL)	19	20
21	22	23	24	25 Caleb Clem Rule 30(b)(6) Deposition (Huntsville, AL)	26	27
28	29 Passover Begins	30	31			

Exhibit A: April 2010 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*¹

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
					Good Friday	
4	5	6	7	8 Tim Kavanaugh Rule 30(b)(6) Deposition (Kansas City, MO)	9	10
Easter						
11	12 Plaintiff Burke Deposition (Manorville, NY)	13	14	15	16	17
18	19	20	21	22 Calvin Thompson Rule 30(b)(6) Deposition (Huntsville, AL)	23	24
25	26	27	28	29	30	

¹ Plaintiffs may, depending on what happens at the Rule 30(b)(6) depositions, request two to four additional depositions of LG USA employees. LG USA has agreed to consider such a request if Plaintiffs make it.

Exhibit “B”

Exhibit B: November 2009 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	6	7
8	9	10	11 Plaintiff Figueroa Deposition (New York, NY) [Completed]	12	13	14
15	16	17	18	19	20	21
22	23 Plaintiffs Lori and Glenn Grosso Depositions (Troy, MI) [Completed] Plaintiffs Jason and Gina Harper Depositions (Sarasota, FL) [Completed]	24 Plaintiff Irving Deposition (White Plains) [Completed] Plaintiff Demski Deposition (Sarasota, FL) [Completed]	25	26 Thanksgiving	27	28
29	30					

Exhibit B: December 2009 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Plaintiff Launch Deposition (Pensacola, FL) [Completed] Plaintiff Boone Deposition (Redding, CA) [Completed]	2	3 Plaintiff Trethewey Deposition (Philadelphia, PA) [Completed] Plaintiff Franko Deposition (Cleveland, OH) [Completed]	4	5
6	7 Plaintiff Scalise Inspection (Huntley, IL) [Completed]	8 Plaintiff Cook-Sommer Deposition (Denver, CO) [Completed] Plaintiffs Richard and Amy Quinn Depositions (Columbia, SC) [Completed] Plaintiffs Lori and Glenn Grosso Inspection (Grosse Pointe, MI) [Completed]	9 Plaintiff Cook Deposition (Denver, CO) [Completed]	10	11 Plaintiff Burke Inspection (Manorville, NY) [Completed]	12
13	14 Plaintiff Vanasse Inspection (Clinton, MA) [Completed]	15	16 Plaintiff Olejniczak Deposition (Houston, TX) [Completed]	17	18	19
20	21	22 Plaintiff Manzello Deposition (Islip, NY) [Completed]	23	24 Christmas Eve	25 Christmas	26
27	28 Plaintiff Olejniczak Inspection (Fulshear, TX) [Completed]	29	30	31		

Exhibit B: January 2010 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 New Years Day	2
3	4	5	6 Plaintiff Figueroa Inspection (Brooklyn, NY) [Completed]	7 Plaintiff Manzello Inspection (Shoreham, NY) [Completed]	8	9
10	11 Plaintiff Irving Inspection (Ridgefield, CT) [Completed]	12	13	14	15	16
17	18 MLK Day	19	20	21	22	23
24	25 Plaintiff Cook- Sommer Inspection (Golden, CO) [Completed]	26 Plaintiff Cook Inspection (Littleton, CO) [Completed] Noelle Fitzgerald Rule 30(b)(6) Testimony on behalf of Procter & Gamble (Cincinnati, OH) [Completed]	27 Noelle Fitzgerald Rule 30(b)(6) Testimony on behalf of Procter & Gamble (Cincinnati, OH) [Completed]	28 Plaintiffs Richard and Amy Quinn Inspection (Lexington, SC) [Completed]	29	30
31						

Exhibit B: February 2010 Calendar for *In re LG Front Load Washing Machine Class Action Litigation*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1 Plaintiffs Jason and Gina Harper Inspection (Sarasota, FL) [Completed]	2 Plaintiff Demski Inspection (Bradenton, FL) [Completed]	3	4	5	6
7	8 Plaintiff Boone Inspection (Redding, CA) [Completed]	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28						